

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SCOTT D. SALMON, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

ACRES LAND TITLE AGENCY, INC.,
ABSOLUTE ESCROW SETTLEMENT
CO., INC. and PETER A. UZZOLINO,

Defendants.

Civil Action No.: 2:24-cv-09305

**CERTIFICATION OF KRISTOFOR
T. HENNING IN SUPPORT OF
MOTION OF DEFENDANTS
ACRES LAND TITLE AGENCY,
INC. AND A-ABSOLUTE ESCROW
SETTLEMENT CO., INC. TO
DISMISS PLAINTIFF’S
COMPLAINT OR,
ALTERNATIVELY, TO STRIKE
ITS CLASS ACTION AND
IMMATERIAL, IMPERTINENT
AND SCANDALOUS
ALLEGATIONS**

Return Date: December 16, 2024

Oral Argument Requested

KRISTOFOR T. HENNING, hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey, a member of the bar of this Court, and a partner of the law firm of McCarter & English, LLP, the attorneys for Defendants Acres Land Title Agency, Inc. and A-Absolute Escrow Settlement Co., Inc. (collectively, “Defendants”). I make this Certification in support of Defendants’ motion to dismiss the Complaint [ECF No. 3] of Plaintiff, Scott D. Salmon, with prejudice for failure to state a claim pursuant to Fed. R. Civ.

P. 12(b)(6) or, alternatively, to strike both (i) the class allegations in the Complaint pursuant to Fed. R. Civ. P. 23(d)(1)(D) and (ii) the allegations regarding alleged kickbacks/business referrals pursuant to Fed. R. Civ. P. 12(f). I am fully familiar with the facts and information set forth herein.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the invoice referenced in paragraph 25 of the Complaint.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 15, 2024

/s/ Kristofor T. Henning
Kristofor T. Henning